

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Amendment of Section 73.202(b)
Table of Allotments,
FM Broadcast Stations,
(Moncks Corner, Kiawah Island, and
Sampit, South Carolina)

)
)
) MM Docket No. 94-70
) RM-8474
) RM-8706
)
)

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

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REPLY TO OPPOSITION TO PETITION FOR RECONSIDERATION

Sampit Broadcasters ("SB"), pursuant to Section 1.429(g) of the Rules, hereby respectfully submits its Reply to the Opposition (the "Opposition") of L.M. Communications II of South Carolina, Inc. ("LMC"), filed October 18, 1996.¹ LMC is licensee of Station WNST(FM) (formerly WJYQ(FM), Moncks Corner, South Carolina. In reply thereto it is stated as follows:

I. LMC's Opposition is Patently Specious

The essence of LMC's Opposition is that SB's Petition for Reconsideration ("SB's Petition") is both too little and too late. At pp. 9-10 of the Opposition, LMC argues that SB's Petition is too little because, *inter alia*,:

(1) LMC argues that SB failed to show that Sampit is incorporated or a census designated place. This argument is specious. If this were solely the test, then no other

¹ This Reply is timely filed within ten days of the date LMC's Opposition was filed. See Section 1.429(g)).

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evidence of community status would be relevant. That is not the law. See, *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 101 (1982). E.g., see *Semora, North Carolina*, 5 FCC Rcd 934, ¶4 (1990) (“*Semora*”), where the Commission allotted a new FM channel to Semora, North Carolina.

(2) LMC argues that SB failed to show that Sampit has any form of local government, a post office and a ZIP code and this is evidence that Sampit is not a community for allotment purposes. That argument is also specious because LMC must know that also is not the law, *Willows and Dunnigon, California*, 10 FCC Rcd 11522, 11523 (Chief, Allocations Branch, 1995) (“*Willows*”). Moreover, LMC must know that Kiawah Island also has no post office² or a separate ZIP code. Attached is a copy of relevant portions of the U. S. Postal Service’s National ZIP Code Directory for 1996. That directory shows no separate post office at Kiawah Island. Instead, the U.S. Postal Service has assigned the ZIP code “29455” to Johns Island, South Carolina (Attachment 1), and the resorts of Kiawah Island and Seabrook Island are shown as places served by the Johns Island Post Office. Clearly, if LMC’s argument on this point against Sampit is well taken, the same argument may be made against allotting a channel to Kiawah Island. However, the bottom line is that whether a community has its own ZIP code is irrelevant to the question of community status.

(3) LMC further argues that: “Finally, Sampit’s Petition contains no evidence that the residents of Sampit receive any municipal services, such as police or water, from any organization or entity associated with Sampit.” Once again LMC raises an irrelevant point.

² *Kiawah Island, South Carolina*, 7 FCC Rcd 6522 (Chief, Allocations Branch, 1992).

LMC consistently raises such irrelevant points solely as straw men in order to be able to strike them down.³

(4) Finally, citing *Ellison Bay, Wisconsin*, 10 FCC Rcd 8082 (Chief, Policy and Rules Division, 1995), LMC argues that the evidence Sampit submitted in its Petition must be rejected as coming too late.⁴

II. Sampit's Petition Is Neither Too Little Nor Too Late

In preparing its Counterproposal, Sampit had every reason to believe that if it made the showing of "community" status set forth in well established law, such a showing would be sufficient. In reliance as precedent, Sampit showed in its Counterproposal that:

(1) Sampit was recognized as a separate community with recognized boundaries, a commercial core area and an active community organization wherein resided 2,807 persons. See, Sampit Counterproposal, Ex. 4B (Attachment 2 hereto);

(2) Sampit had a number of business and civic organizations (Attachment 2 to the Counterproposal) (Attachment 3 hereto).

³ "Semora has no local government and provides no municipal services except for its volunteer fire department." *Semora* at 935.

⁴ LMC's assertion in this regard is totally inconsistent with the legal position LMC asserted in its Reply to Sampit's Opposition to LMC's Petition for Reconsideration also filed on October 18, 1995. There LMC argued that the change in its reference site first set forth in a letter from an FAA consultant, attached to LMC's Petition for Reconsideration, was justification for the FCC to reverse its denial of LMC's petition, even though LMC submitted no showing that the new reference point would meet the requisite separation standards, and no showing why LMC could not have relocated the reference point at an earlier stage of the proceeding.

In *Beacon Broadcasting*, 2 FCC Rcd 3469, 3471, ¶12 (1987) (“*Beacon*”),⁵ *recon. denied*, 2 FCC Rcd 1562 (1987) (“*Beacon Recon.*”); *aff’d. sub. nom.*, *New South Broadcasting Corp. v. FCC*, 879 F.2d 867 (D.C. 1989), the Commission held that a showing by a local governmental official that there exists a distinct area recognized by local governmental officials to be a community is sufficient to establish community status. LMC, which operates a broadcast station at Moncks Corner, South Carolina, a mere hop, skip and jump from Sampit, made no effort to present one scintilla of evidence to the contrary.⁶

Sampit made a *prima facie* case under the standards established by the Commission in *Beacon*. Sampit showed: (1) that the county governmental Planning Commission recognized that Sampit had a defined area with a population of 2,607 residents; and (2) within that defined area there were at least thirty-nine businesses, religious entities and civic organizations. Moreover, Sampit was shown as a recognized community in the 1995 *Rand McNally Commercial Atlas*.⁷

Beacon addressed similar showings as sufficient to prove community status. Definitive borders are not necessary. *Beacon* at 3470, ¶10. Rather, the Commission held that:

“[a] community consists of the individuals who reside in proximity at some locality - the borders of which may or may not be precisely ascertained - and who are commonly perceived as comprising a collective, or grouping of sorts.” *Beacon* at 3470-3471.

⁵ “The standard to be applied in determining whether a specified locality is a “licensable” community is not a stringent one, however...” *Beacon* at 3740 ¶9.

⁶ *Washoe Shoshone Broadcasting*, 3 FCC Rcd 3948, 3948 (Rev. Bd., 1988) (Where a party has the ability to present evidence in its favor but fails to do so, it must be presumed that the evidence, if produced, would be contrary to its position.)

⁷ Listing as a recognized community in the *Rand McNally Commercial Atlas* has long been recognized as one of the indicia of community status. *Beacon* at 3470, ¶10; *Semora* at 935, n.10; *Willows* at 11523, ¶8.

The showing in the counterproposal (See Attachment 3) that there were a number of business, social and civic organizations within the area bearing the name of the community is probative evidence.⁸ *Beacon* at 3471, ¶13. Thus, Sampit had every reason to believe that in the counterproposal it had made a *prima facie* case of community status for Sampit. Yet in the *R&O* this showing was rejected.

III. *The Public Interest Standard Was Ignored.*

47 C.F.R. §1.429(b) permits the introduction of new facts in a petition for reconsideration where consideration of the facts relied on is in the public interest, as LMC recognized at p.3 of the Opposition. The establishment of a first local service to a community is the second priority of FM allotment. *FM Channel Policies and Procedures*, 90 FCC 2d 88, 92 (1982). Thus, further proof that Sampit is a community for allotment purposes fulfills the second priority and therefore its consideration is in the public interest.

That further evidence submitted in Sampit's Petition for Reconsideration clearly is analogous to that which the Commission found sufficient in *Beacon Recon.* at ¶5.

Beacon further argues that the finding on which we primarily relied - namely, that local businesses, schools, churches, and a civic organization identify themselves with Fairforest by including the word "Fairforest" in their names or addresses - is of little moment in light of countervailing evidence. In this regard, *Beacon* asserts that most of the churches and businesses in the vicinity do *not* identify themselves with Fairforest in such fashion; that some of those businesses and churches instead identify themselves with Spartanburg; that the telephone numbers of residences and businesses in Fairforest are included in the telephone directory for Spartanburg; and that the enrollment of the public schools that are situated in Fairforest includes children who reside elsewhere.

⁸ At p. 10 of its Opposition, LMC argues that the fact that there are a number of entities bearing the "Sampit" trade name merely proves that they are located in proximity to the Sampit River. This is as meaningless as to argue that the fact that there are a number of entities bearing the trade name "Potomac" merely proves that they are located in proximity to the Potomac River and not that "Potomac" is a community.

We do not agree that this evidence negates or outweighs the “indicia of community” presented here. Fairforest is designated by name on highway signs and on an official map prepared by the South Carolina Dept’s of Highways and Public Transportation, and businesses, churches, and schools in the vicinity identify Fairforest as their locale by including “Fairforest” in their names or giving it as their place of address. These facts plainly demonstrate that there is a common and widely held perception of Fairforest as a place distinct from its surroundings. Moreover, the place is inhabited by a populace of appreciable size; it has a complement of retail stores, other business establishments, churches, and schools; and it is not encompassed or intersected by the borders of incorporated municipalities. That is a sufficient basis for the holding, in light of the precedent cited in our previous ruling.

As a matter of human nature, it is extraordinary for ordinary citizens to be willing to publicly endorse any matter which is the subject of controversy, unless they feel very strongly about the issue.

In its Petition for Reconsideration, SB once again provided the testimony of public witnesses who defined its boundaries. This information is critical to the issue of whether the applicant can provide the requisite community coverage to the city of license.⁹

After that technical requirement has been shown to have been met, the most significant evidence¹⁰ is a showing that residents and businesses which lie within the boundaries of Sampit “consider themselves to belong to the [community].” *Mighty-Mac Broadcasting Co.*, 58 RR 2d 599 (Rev. Bd., 1985) (“*Mighty-Mac*”).

Here, again SB provided substantial evidence on this issue in its Petition for Reconsideration. Public witnesses were willing to give declarations that they knew would be

⁹ *Naples, North Naples, Immokalee, Florida*, 41 RR 2d 1550, 1554 (Chief, Broadcast Bureau, 1977).

¹⁰ In *Mighty-Mac* the opponent made a positive effort to introduce evidence to the contrary. Here, despite every opportunity LMC has presented no evidence to the contrary. Instead, LMC would ask the FCC to make a finding based on speculation that businesses associate their name with a river rather than a community.

used in an FCC proceeding attesting as to their identification of themselves as members of the Sampit community and their nexus with that community.

In Attachment 1 to the Petition, twelve (12) business owners identified their businesses as operated in Sampit, South Carolina. In Attachment 2, four (4) civic organizations so identified themselves. In Attachment 3, fifteen (15) persons associated with the Sampit Elementary School offered their testimony that they identified the school as dedicated to meeting the needs of the residents of Sampit, and in Attachment 4 twenty-five (25) individual residents provided similar testimony. Additionally, Attachments 5 and 6 were the statements of the County Administrator and a member of the South Carolina State Senate who both testified that Sampit is a "community."

Having been given abundant opportunity between September 13, 1996, when Sampit filed its Petition for Reconsideration and October 18, 1996, when LMC filed its Opposition, LMC did not present even one person to rebut these public witnesses. Therefore, the public witnesses' testimony stands unrebutted.

In light of the case precedent cited herein, it is respectfully submitted that the unrebutted testimony fully supports the proposition that the second FM allotment priority supports the allotment of FM Channel 289A to Sampit, South Carolina.

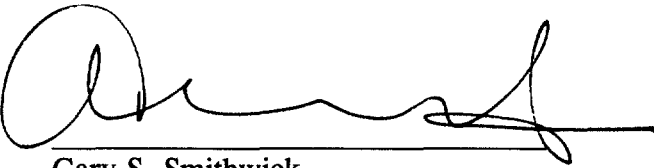
III. Conclusion

In light of the above, it is respectfully submitted that Sampit Broadcasters has sustained its burden of showing that Sampit, South Carolina, is a community for allotment purposes and

thus the FCC should assign FM Channel 289A to Sampit and deny LMC's proposal to reallocate Channel 287C3 from Moncks Corner to Kiawah Island as Channel 288C2.

Respectfully submitted,

SAMPIT BROADCASTERS

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October 28, 1996

ATTACHMENT 1



**National
ZIP Code®
Directory
Volume II: N-W**

States listed alphabetically
Nebraska - Wyoming

Expires December 31,

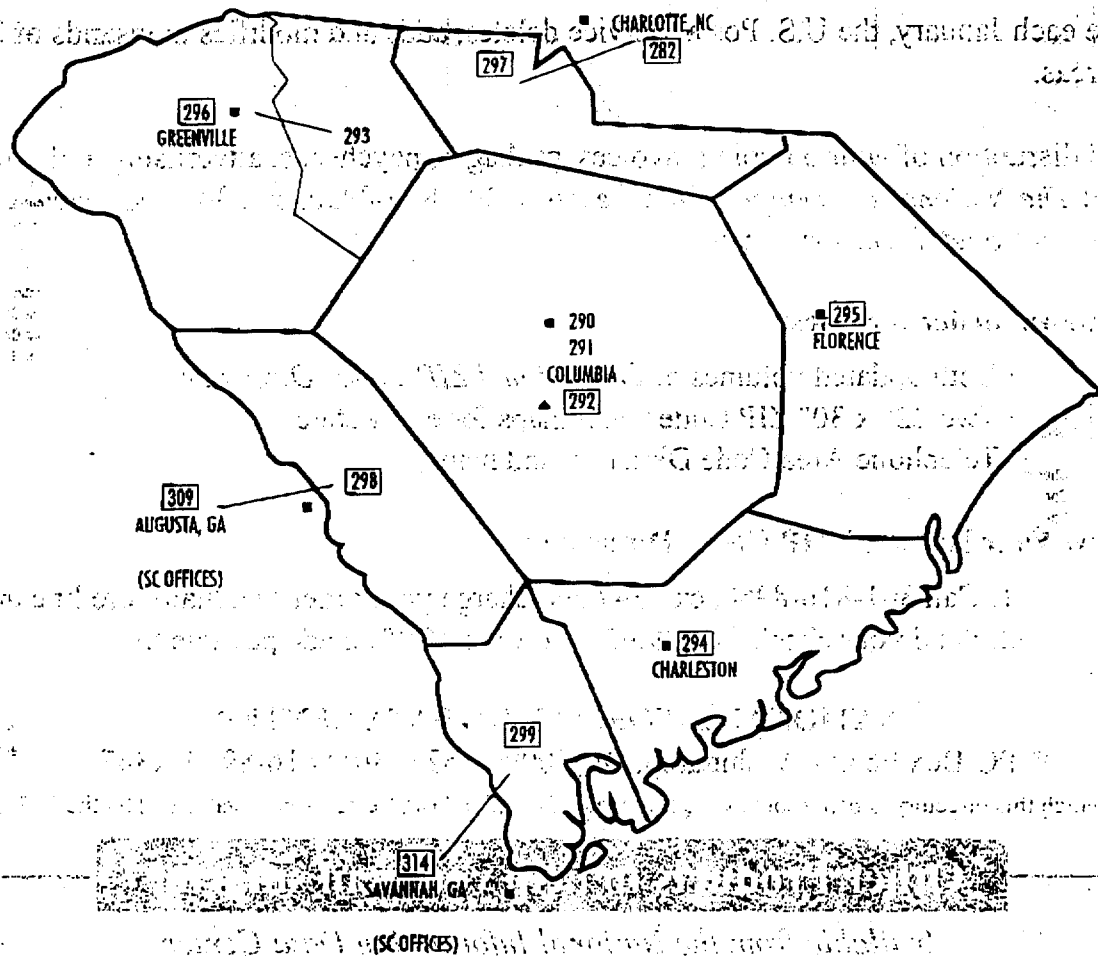
1996

THE NATIONAL INFORMATION DATA CENTER
a division of United Communications Group and
non-exclusive licensee of the U.S. Postal Service

ALSO INCLUDES...

- ★ **22" x 30" WALL MAPS.** See back of Volume I and Volume II
- ★ **TELEPHONE AREA CODE LISTINGS.** See back of Volume II
- ★ **RE-ORDER FORM.** See back covers of Volume I and II.

SOUTH CAROLINA



LEGEND:

- A processing and distribution center that serves associate post offices within that three-digit ZIP Code area.
- ▲ A city that has been assigned its own three-digit ZIP Code but is not a processing and distribution center, unless denoted also with a ■.
- XXX Indicates three-digit postmark used for cancellation at the processing facility that serves one or more three-digit areas as indicated.

NOTE: This map provides an approximation of the service area of each processing and distribution center facility. Consult Section 3 of this Directory for specific information.

STATE LIST OF POST OFFICES

SOUTH CAROLINA

SOUTH CAROLINA		Post office and county	ZIP Code	Post office and county	ZIP Code	Post office and county	ZIP Code	Post office and county	ZIP Code
(Abbreviation: SC)									
Post office and county	ZIP Code								
Abbeville C	29620	Cameroon, Calhoun	29030	Cape, Orangeburg	29038	Yonkers Island P	29661	Marietta, Greenville	29661
Abbeville, Charleston	29426	Campobello, Spartanburg	29322	Cardsville, Berkeley	29434	Hansa Path, Anderson C	29654	Marion, Marion C	29571
Adrian P		Canadys, Colleton N	29433	Cardozo, Orangeburg	29039	Hopkins, Richland	29061	Martin, Abbeville	29836
Adrian G C		Capital, S x		Cartersville, Colleton	29435	Hardee, Sumter N	29062	Mauldin, Greenville C	29662
(SEE PAGE 3-2107)		(See Columbia)		Catonsville, York	29304	Hager, Berkeley	29450	Mayesville, Sumter	29104
Adrian S x		Carleton, Union	29031	Cayce, Lexington	29033	Hampton, Spartanburg C	29349	Saint Charles P	
Adrian, Clarendon	29001	Cassatt, Kershaw	29032	Cayce, West Columbia P		Imo, Lexington	29063	Mayor, Spartanburg N	29368
Adrian, Allendale C	29810	Catonsville, P Norris	29667	Cedar Springs, S x		Islandton, Colleton	29929	Mc Bee, Chesterfield	29101
Adrian, P Saint Stephen	29479	Cayce, Lexington	29033	(See Spartanburg)		Isla Of Palms, Charleston C	29451	Mc Chalmers, Charleston	29458
Adrian, Anderson C		Centenary, Marion N	29519	Central, Pickens	29630	Irby, Anderson	29655	Mc Coll, Marlboro C	29570
(SEE PAGE 3-2109)		Central, Pickens	29630	Chapin, Lexington	29036	Irby, Aiken	29831	Mc Connells, York	29726
Adrian, North Anderson S x		Chapin, Lexington	29036	Chapin, Lexington	29036	Jacksonboro, Colleton N	29452	Mc Cormick, McCormick	29835
Adrian, South Anderson S x		Chapin, Lexington	29036	Chapin, Lexington	29036	James Island, S x G		Meggett, P Hollywood	29449
Adrian, Georgetown C	29510	Chapin, Lexington	29036	Chapin, Lexington	29036	(See Charleston)		Miley, Hampton N	29933
Adrian, Spartanburg N	29320	Chapin, Lexington	29036	Chapin, Lexington	29036	Jamesville, Berkeley	29453	Milam, Dillon N	29573
Adrian, S x		Chapin, Lexington	29036	Chapin, Lexington	29036	Shilohville P		Modoc, McCormick	29838
Adrian, (See Charleston)		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Moncks Corner, Berkeley C	29461
Adrian, (See Greenville)		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Oakley P	
Adrian, Charleston	29429	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Monetta, Saluda	29105
Adrian, Horry	29511	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Monticello, Fairfield N	29106
Adrian, Richland N	29002	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Monticello, Aiken N	29839
Adrian, Bamberg G C	29003	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Monks, Spartanburg	29369
Adrian, Bamwell C	29812	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Mountain Rest, Oconee	29664
Adrian, Lexington	29006	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Mount Carmel, McCormick	29840
Adrian, Aiken N	29816	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Mount Croghan, Chesterfield	29727
Adrian, Beaufort G C		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Mount Holly, P Goose Creek	29445
(SEE PAGE 3-2112)		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	MOUNT PLEASANT, Charleston C	
Adrian, B x		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	(SEE PAGE 3-2146)	
Adrian, Naval Hospital S x		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Myrtle Beach, Horry C	
Adrian, Paris Island B x		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	(SEE PAGE 3-2146)	
Adrian, Park Island, Aiken N	29842	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Dunes S x	
Adrian, Park Island, CPO x North		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Socastee S x	
Adrian, Augusta	29841	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Surfside Beach B x	
Adrian, Anderson C	29627	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Naval Hospital, S x	
Adrian, North Augusta	29841	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	(See Beaufort)	
Adrian, Marlboro C	29512	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Naval Weapons, S x G	
Adrian, S x		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	(See Goose Creek)	
(See Greenville)		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Moncks, Orangeburg	29107
Adrian, P Clover	29710	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Neander, Williamsburg	29580
Adrian, North Berkeley N	29430	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Newberry, Newberry C	29108
Adrian, Kershaw	29009	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	New Elberton, Aiken C	29809
Adrian, Lee G C	29010	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Newry, Oconee N	29665
Adrian, Wiscay P		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	New Zion, Clarendon	29111
Adrian, Cherokee C	29702	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Nichols, Horry	29581
Adrian, Cherokee Falls P	29014	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Ninety Six, Greenwood C	29666
Adrian, Bamwell C	29817	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Norris, Pickens	29667
Adrian, Fairfield	29015	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	North, Orangeburg	29112
Adrian, Marlboro	29516	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	North Anderson, S x	
Adrian, Beaufort	29910	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	(See Anderson)	
Adrian, Richland	29016	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	North Augusta, Aiken C	29841
Adrian, Spring Springs, S x		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Beach Island CPO x	
(See Spartanburg)		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Belvedere P	
Adrian, Berkeley	29431	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	North Charleston, B x G	
Adrian, Sumter N	29017	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	(See Charleston)	
Adrian, Green, York N	29703	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Northwest, S x	
Adrian, Orangeburg	29018	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	(See Columbia)	
Adrian, Greenwood	29819	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	NORTH MYRTLE BEACH, Horry C	
Adrian, Orangeburg C	29432	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	(SEE PAGE 3-2148)	
Adrian, S x		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Cherry Grove P	
(See Greenville)		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Cherry Grove Beach B x	
Adrian, Hampton	29911	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Coastal S x	
Adrian, Backport P		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Ocean Drive P	
(See Conway)		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Northside, S x	
Adrian, Union	29321	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	(See Greenwood)	
Adrian, S x		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Norway, Orangeburg	29113
(See Gaffney)		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Okaloosa, P Beaufort	29910
Adrian, B x		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Oakley, P Moncks Corner	29461
(See Beaufort)		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Ocean Drive, P North Myrtle	
Adrian, Williamsburg	29518	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Beach	29582
Adrian, Caldwell Street, S x		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Olanta, Florence	29114
(See Rock Hill)		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Olivia, Bamberg	29843
Adrian, Calhoun Falls, Abbeville C	29628	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	Ora, P Gray Court	29645
Adrian, Kershaw G C	29020	Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	ORANGEBURG, Orangeburg C	
		Chapin, Lexington	29036	Chapin, Lexington	29036	Jefferson, Chesterfield	29718	(SEE PAGE 3-2148)	

† This Post Office has more than one five-digit ZIP Code; consult the part titled "Post Offices with Street Listings", immediately following this State List.

[illegible]

2992/28	Spanish Wells Plantati Rd	2992/28
2992/28	Sparkleberry Ln	2992/28
2992/26	Sparrow Hawk Ct	2992/26
2992/28	Spargina Cres	2992/28
2992/28	Spargina Ct	
2992/28	1-11 (OOD)	2992/28
2992/28	1-99 (OOD)	2992/28
2992/26	2-10 (EVEN)	2992/28
2992/26	2-98 (EVEN)	2992/28
2992/26	12-99	2992/28
2992/28	Spargina Point Dr	2992/26
2992/28	Spargwheel Ln	2992/28
2992/26	Spargwheel Ln	2992/26
2992/26	Spargwheel Ct	2992/28
2992/26	Spargwheel Sandpiper Rd	2992/28
2992/26	Spring Hill Ln	2992/28
2992/26	Spring Pond Rd	2992/26
2992/26	Squire Pige Rd	2992/26
2992/26	Squire Gate Rd	2992/26
2992/26	Stable Gable Rd	2992/26
2992/28	Starboard Tack	2992/28
2992/28	Starfish Dr	2992/28
2992/28	Steam Gun Pl	2992/28
2992/28	Stevens Ct	2992/26
2992/28	Silverwater Ct & Ln	2992/26
2992/28	Stonegate Ct & Dr	2992/26
2992/28	Stoney Creek Rd	2992/28
2992/28	Strath Ct	2992/28
2992/28	Strawberry Hill Rd	2992/28
2992/26	Stuart Pl	2992/28
2992/26	Sugar Pine Ln	2992/26
2992/28	Summer Breeze Ct	2992/28
2992/28	Sunners Ln	2992/26
2992/26	Sundew Ct	2992/26
2992/28	Sunflower Ct	2992/26
2992/28	Sunningdale Ln	2992/26
2992/26	Sunset Pl	2992/26
2992/28	Surf Scooter Rd	2992/28
2992/28	Sunny Ln	2992/26
2992/28	Sussex Ln	2992/26
2992/26	Sutherland Ct	2992/28
2992/26	Sutters Row	2992/28
2992/26	Sweet Bay Ln	2992/26
2992/26	Sweet Gum Ct & Ln	2992/26
2992/26	Sweethwater Ln	2992/26
2992/28	Swing About	2992/28
2992/28	Sycamore Ln	2992/26
2992/28	Sylvan Ln	2992/28
2992/26	Tabby Rd	2992/28
2992/28	Tabby Trl	2992/26
2992/28	Tall Pines Rd	2992/26
2992/28	Tanglewood Dr	2992/28
2992/28	Tanseyleaf Dr	2992/26
2992/28	Tatnell Pl	2992/28
2992/26	Teal Ln	2992/26
2992/28	Teal Wood Ct	2992/26
2992/28	The Anchorage	2992/28
2992/26	Thompson Rd	2992/26
2992/28	Three Mast Ln	2992/28
2992/26	Tidepoint	2992/28
2992/26	Timber Ln	2992/26
2992/26	Timbermarsh Ln	2992/26
2992/28	Tombee Ct	2992/28
2992/28	Tombsley Ct	2992/28
2992/28	Toppin Ct & Dr	2992/26
2992/26	Topside	2992/28
2992/26	Tower Mt	2992/26
2992/26	Towhee Rd	2992/26
2992/26	Town Center Ct	2992/28
2992/26	Trails End Rd	2992/26
2992/28	Tree Swallow Ct	2992/26
2992/28	Trent Jones Ln	2992/28
2992/28	Tringier Fish Ln	2992/26
2992/28	Trillium Ln	2992/26
2992/28	Trimblestone Ln	2992/28
2992/28	Troon Dr	2992/28
2992/28	Trucker Ridge Ct	2992/26
2992/28	Truett Rd	2992/28
2992/26	Tunkley Hill Ln	2992/28
2992/26	Tumberry Ln	2992/28
2992/26	Tumbridge Dr	2992/28
2992/28	Turret Shell Ln	2992/26
2992/28	Turtle Dove Ln	2992/26
2992/26	Twickenham Ln	2992/28
2992/28	Twin Pines Ct & Rd	2992/28
2992/26	Twisted Bay Ln	2992/26
2992/28	Twisted Oak Ct	2992/26
2992/28	Union Cemetery Ln & Rd	2992/26
2992/28	Up Wind	2992/28
2992/28	Us Highway 278	
2992/26	1-99	2992/26
2992/28	500-1099	2992/28
2992/26	Valencia Rd	2992/28
2992/28	Venusta Pl	2992/26
2992/26	Victoria Cr & Dr	

POSTMASTER AND GENERAL DELIVERY

General Delivery	2
Postmaster, PO Box 29455	2

POST OFFICE BOXES MAIL OFFICE, STATIONS AND BRANCHES

No. Nos.	
1600	Johns
	Island
9455-29456	Johns
	Island

RURAL ROUTES

02, 03, 04, 05, 06, 07, 08	2
09, 10	2

NAMED STREETS

Street Addresses	2
------------------	---

LANCASTER SC

POSTMASTER AND GENERAL DELIVERY

General Delivery	2
Postmaster	2

POST OFFICE BOXES MAIL OFFICE, STATIONS AND BRANCHES

No. Nos.	
7000	Lancaster
98-9998	Lancaster

RURAL ROUTES

02, 03, 05, 06, 07, 08, 09	2
10, 11, 12, 13	2

NAMED STREETS

Street Addresses	2
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LEXINGTON SC

POSTMASTER AND GENERAL DELIVERY

General Delivery	2
Postmaster, 710 W Main St.	2

POST OFFICE BOXES MAIL OFFICE, STATIONS AND BRANCHES

No. Nos.	
PO Boxes	Lexington

RURAL ROUTES

02, 03	2
05, 06	2
09, 10, 11	2
14, 15	2
17	2
19, 20, 21	2

Mr. Nos. 1600 Johns Island 29
455-29456 Johns Island 29

02, 03, 04, 05, 06, 07, 08,
09, 10. 29

Street Addresses 294

**POSTMASTER AND GENERAL
DELIVERY**

POST OFFICE BOXES MAIN
OFFICE, STATIONS AND
BRANCHES

0000	Lancaster297
98-9998	Lancaster297

PLURAL ROUTES

10, 11, 12, 13.....297
HAIR, STIFF

2014

POSTMASTER AND GENERAL
DELIVERY:

General Delivery 290
Postmaster: 710 W Main St., 290

**POST OFFICE BOXES MAIN
OFFICE, STATIONS AND
BRANCHES**

PO Boxes Lexington 290

RURAL ROUTES

SI	2992
SI	2992
SI	2992
SI	2992
SI	2992

SOUTH CAROLINA

STATE LIST OF POST OFFICES

Post office and county	ZIP Code	Post office and county	ZIP Code	Post office and county	ZIP Code
Orchard Park, S x		Saint Stephen, Berkeley	29479	Timmansville, Florence C.	29161
(See Greenville)		Alvin P		Townville, Anderson	29689
Orange, P		Salmon, Oconee	29676	Travelers Rest, Greenville C.	29690
(See Sumter)		Salley, Aiken	29137	Trouton, Edgefield	29847
Pacolet, Spartanburg	29372	Salter, Williamsburg	29590	Trio, P Salter	29990
Pacolet Mills, Spartanburg N.	29373	Trice P		Troy, Greenwood	29848
Pageland, Chesterfield C.	29128	Saluda, Saluda C.	29138	Turboville, Clarendon	29162
Pamplico, Florence	29583	Sandy Springs, Anderson N.	29677	Ulmur, Alendale	29849
Part Plaza, S x		Santee, Orangeburg	29142	Uma, Spartanburg N.	29378
(See Greenville)		Sardis, Clarendon N.	29143	Union, Union C.	29379
Partonville, McCormick N.	29844	Scott, Hampton N.	29939	University, S x	
Patrick Island, B x		Scranton, Florence	29591	(See Columbia)	
(See Beaufort)		Seabrook, Beaufort	29940	Valley Falls, CPO x	
Patrick, Chesterfield	29584	Seabrook Island, P Johns		Spartanburg	29303
Pauline, Spartanburg	29374	Island	29455	Vance, Orangeburg	29163
Glenn Springs P		Sellers, Marion	29592	Van Wyck, Lancaster	29744
Pawleys Island, Georgetown	29585	SENECA, Oconee C		Vannoy, Hampton	29944
Paxville, CPO x Manning	29102	(SEE PAGE 3-2152)		Vaucluse, Aiken N.	29850
Peak, Newberry N.	29122	Sharon, York	29742	Wadmalaw Island, Charleston	29487
Pelton, Lexington	29123	Shaw A F B, Sumter	29152	Wagener, Aiken	29164
Pelzer, Anderson C.	29669	Shaw Alb P.		Wallula, Oconee C.	29691
Pendleton, Anderson C.	29670	Shaw Alb, P Shaw A F B	29152	Wallace, Marlboro	29596
Perry, Aiken N.	29124	Sheldon, Beaufort N.	29941	Walterboro, Colleton C.	29488
Pickens, Pickens C.	29671	Shoals Junction, P Donalds	29638	Ritter P	
Piedmont, Greenville C.	29673	Shulerville, P Jamestown	29453	Wando, P	
Powersville S x		Silverside, Newberry	29145	(See Charleston)	
Pinebluff, S x G		SIMPSONVILLE, Greenville C		Ward, Saluda	29166
(See Charleston)		(SEE PAGE 3-2155)		Ware Bluffs, Greenwood C.	29692
Pinebluff, Jasper	29934	Six Mile, Pickens	29682	Warrenton, Aiken	29851
Pineville, Berkeley	29468	Slater, Greenville N.	29683	Watson, Laurens	29384
Pineview, Sumter	29125	Smalls, Colleton	29481	Wedgfield, Sumter	29168
Rimini P		Smyrna, York	29743	Wellford, Spartanburg	29385
Pinewood, S x		Socastee, S x		WEST COLUMBIA, Lexington	
(See Spartanburg)		(See Myrtle Beach)		(SEE PAGE 3-2165)	
Pineopolis, Berkeley	29469	Society Hill, Darlington	29593	West Columbia, P Cayce	29033
Pineau, S x		South Anderson, S x		Westgate, S x	
(See Greenville)		(See Anderson)		(See Spartanburg)	
Pine Branch, McCormick	29845	South Greenwood, S x		Westminster, Oconee C.	29693
Pawnee, Newberry	29126	(See Greenwood)		Madison P.	
Port Royal, Beaufort C.	29935	South Of The Border, CPO x		West Union, Oconee	29696
Poston, Florence N.	29588	Harmer	29647	Westonville, Kershaw	29175
Powdermill, S x		South Park, S x		White Oak, Fairfield N.	29176
(See Piedmont)		(See Florence)		White Rock, Richland N.	29177
Prosperity, Newberry	29127	SPARTANBURG, Spartanburg C.		White Stone, Spartanburg N.	29386
Quincy, B x		(SEE PAGE 3-2156)		Whitlow, Newberry C.	29178
(See Florence)		Boiling Springs S x		Williams, Colleton N.	29493
Rainey, Marion N.	29589	Cedar Springs S x		Williamston, Anderson C.	29697
Ranwell, Charleston	29470	Hickory S x		Williston, Barnwell G C.	29853
Ravenel, Charleston	29471	Phewood S x		Windsor, Aiken	29856
Rehoboth, Spartanburg N.	29375	Valley Falls CPO x		Wintersboro, Fairfield G C.	29180
Rehoboth, Sumter	29128	Westgate S x		Winthrop College, S x	
Richburg, Chester	29729	Springfield, Orangeburg	29146	(See Rock Hill)	
Richland, Oconee N.	29675	Start, Anderson	29684	Winthrop, P Bishopville	29010
Ridgeland, Beaufort G.	29936	Stark, Spartanburg N.	29377	Woodruff, Spartanburg C.	29388
Coosawatchie P		State Park, Richland N.	29147	Wynnesboro, Hampton	29945
Ridge Spring, Saluda	29129	Station #1, S x		Yemassee Island, P Hollywood	29449
Ridgely, Dorchester	29472	(See Easley)		York, York G C.	29745
Ridgeway, Fairfield	29130	St Helena Island, Beaufort	29920		
Rindal, P Pinewood	29125	Sullivan Island, Charleston	29482		
Rice, Fairfield N.	29132	Summerville, S x			
Ridder, P Walterboro	29488	(See Aiken)			
River Hills, P Clover	29710	Summerton, Clarendon	29148		
ROCK HILL, York G C.		SUMMERVILLE, Dorchester C.			
(SEE PAGE 3-2150)		(SEE PAGE 3-2160)			
Calhoun Street S x		SUMMIT, Sumter C.			
Cherry Road S x		(SEE PAGE 3-2163)			
Winthrop College S x		Osage P			
Roebuck, Spartanburg	29376	Sumter, Pickens	29685		
Rosedale, Colleton	29474	Surfside Beach, B x			
Roseville, Orangeburg	29133	(See Myrtle Beach)			
Ruby, Chesterfield	29741	Sumner, Lexington	29160		
Ruffin, Colleton	29475	Sycamore, Alendale N.	29846		
Russellville, Berkeley N.	29476	Tammara, Oconee	29686		
Saint Andrews, S x G		Tatum, Marlboro N.	29594		
(See Charleston)		Taylor, Greenville C.	29687		
Saint Charles, P Mayesville	29104	Tega Cay, B x			
Saint George, Dorchester C.	29477	(See Fort Mill)			
Saint Matthews, Calhoun C.	29135	Tiger, Greenville N.	29688		
Fort Motte P		Tilman, Jasper	29943		

†This Post Office has more than one five-digit ZIP Code, consult the part titled "Post Offices with Street Listings" immediately following this State List.

ATTACHMENT 2

GEORGETOWN COUNTY PLANNING COMMISSION

1200 HIGHMARKET STREET
GEORGETOWN, S.C. 29440

Telephone (803) 546-3602
FAX (803) 527-3902

CHAIRMAN
Robert Patterson

VIC CHAIRMAN
Jenny Chandler

MEMBERS
D.J. Berrill
Barbara Allen
Dan Manning
Linda Murrell
Walter LeRoy Shaw, Jr.

STAFF
Bill Schwabkopf
David Essex
Michael Perry
Jack Saville
Mark Howler

Exhibit #4B
COUNTER PROPOSAL
NPRM NM Dec No. 94-70 (RM-3474)
Sampit Broadcasters
Sampit, Moncks Corner &
Kiawah Island, SC
August 1994

August 16, 1994

Mr. Bill Brown
Bromo Communications, Inc.
P.O. Box 1588
Clayton, GA 30525

RE: Identification of Sampit Community

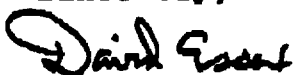
Dear Mr. Brown:

In response to our telephone conversation yesterday, please be advised that the Sampit area of Georgetown County meets the definition of "community". As shown on the attached map, the Sampit Community has a defined center, and a small commercial core does exist along U.S. 17-A. In addition, there is an active community organization (Sampit Community Organization, Inc.), a school and several churches in the area. If you need any specific information about the community, I suggest you contact Mr. Samuel Wragg (546-3939).

The general area depicted on the map contains approximately 1000 houses and 2607 persons of which 1176 are white and 1431 are black. Since the Sampit Community is an unincorporated area, no defined boundaries are available. The community boundary shown on the map is subject to interpretation.

Please call if I can assist you further.

Sincerely,



David Essex
Assistant Planning Director

Enclosure

DE/bac



GEORGE JWN COUNTY PLANNING COMMISSION

1230 HIGHMARKET STREET
GEORGETOWN, S.C. 29440

Telephone (803) 546-8502
FAX (803) 527-2302

CHAIRMAN
Robert Patterson

VICE-CHAIRMAN
Frank Swinnie, Jr.

MEMBERS
D.J. Barnhill
Barbara Allen
Dan Memminger
Louis Morant
Randolph Kirkland

STAFF
Bill Schwartzkopf
David Essex
Michael Penny
Jack Scoville

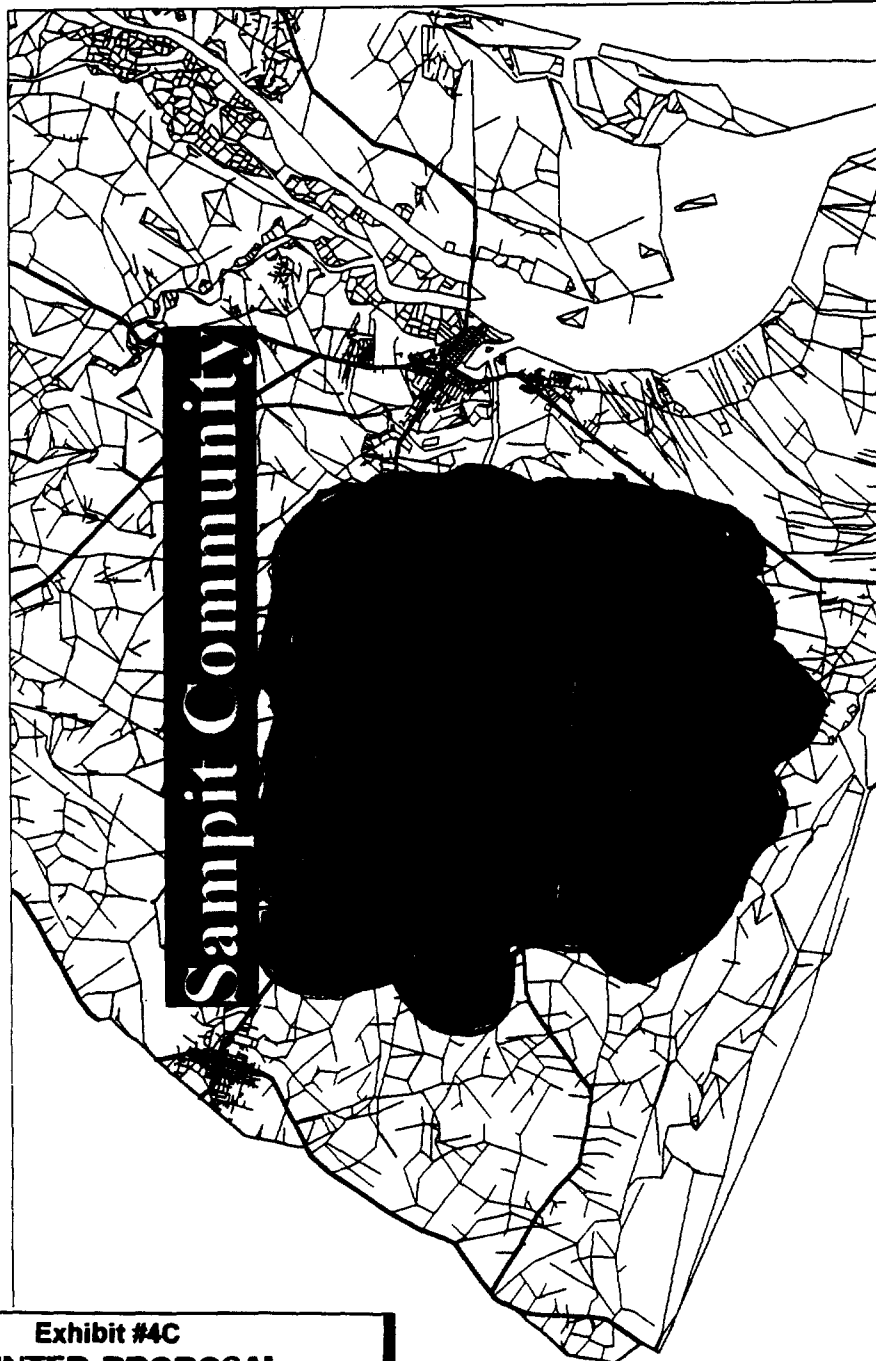


Exhibit #4C
COUNTER PROPOSAL
NPRM MM Dec No. 94-70 (RM-8474)
Sampit Broadcasters
Sampit, Moncks Corner &
Kiawah Island, SC
August 1994

ATTACHMENT 3

ATTACHMENT 3

Businesses and Organizations in Sampit, South Carolina

Red Duke's Used Cars
H+S Oil Company and Propane Gas
Joyner Transfer
Springs Store
International Paper Company (satellite offices)
Roberts Body Shop
Jemco Sales Mobile Homes
Sampit Pentecostal Church
Georgetown County Rural Fire Department
(located in Sampit)
Georgetown County Water and Sewer Division
(located in Sampit)
Sampit Lumber Mill
Habies Lounge
Video Country
Rocky's Grocery
Altman's Beauty Salon
Hoyt Smith Grocery/Liquor Store
Sampit Laundry Mat
BB Grocery
Sampit Methodist Church
Sampit Elementary School
Citgo Gas Station
Linda's Crafts
Baptist Church
Touch of Class
Sampit Monument Company
Sampit Laudromat
Smith Grocery
New Hope Church
Sampit Community Child Care Center
St. Paul's Methodist Church
Sampit Action Community Group
Sampit Senior Citizens Center
Sampit Community Organization, Inc.
Smith Logging
Reddick's Used Cars
Bone Logging
Masons
Emerald Club
Eastern Star

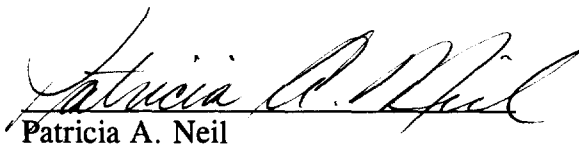
CERTIFICATE OF SERVICE

I, Patricia A. Neil, a secretary in the law offices of Smithwick & Belendiuk, P.C., certify that on this 28th day of October, 1996, copies of the foregoing were mailed, postage prepaid, to the following:

Mr. John A. Karousos*
Chief, Allocations Branch
Federal Communications Commission
2000 M Street, N.W.
Room 536
Washington, D.C. 20554

Ms. Sharon P. McDonald*
Federal Communications Commission
2025 M Street, N.W.
Room 8316
Washington, D.C. 20554

Sally A. Buckman, Esquire
Leventhal, Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006-1809
Counsel for L.M. Communications II of South Carolina, Inc.


Patricia A. Neil

*by hand delivery